

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

<i>In re:</i> KAREN PAMELIA SHRIER <i>Debtor</i>	§ § § § §	CASE NO. 16-10420 Chapter 13
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**DEBTORS' RESPONSE TO CHAPTER 13 TRUSTEE'S MOTION TO DISMISS AND
NOTICE OF OPPORTUNITY OF HEARING**

TO THE HONORABLE TONY M. DAVIS, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, **Karen Pamela Shrier**, "Debtor" herein, and files this her Response to the Chapter 13 Trustee's Motion to Dismiss and Notice of Opportunity of Hearing and would show the Court as follows:

I.

Debtor filed this Chapter 13 Bankruptcy on April 8, 2016. The case was confirmed on July 19, 2016 .

II.

Debtor, Karen Pamela Shrier, admits that she is in default of the Chapter 13 Plan and states that said default is due to failure of the funding for her company to close as expected. Debtor has not received her wages because of the lack of funding for her company. Debtor believes approval for the funding expected will be complete before the date of the hearing set on the Motion to Dismiss. When the funding is received, Debtor will be able to receive her back wages and will be able to cure the delinquency on her plan payment.

WHEREFORE, PREMISES CONSIDERED, Karen Pamela Shrier, "Debtor" herein, prays that this Court deny the Trustee's Motion to Dismiss and Notice of Opportunity for Hearing, based upon her intention to cure the delinquency before the hearing set on the Motion to Dismiss and for such other and further relief, both general and specific, at law or in equity, to which Debtor may be entitled.

Respectfully submitted,

LAW OFFICES OF
DOUGLAS J. POWELL, P.C.

/S/ Douglas J. Powell
Douglas J. Powell
Attorney for Debtor
820 W. 10th Street
Austin, TX 78701
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CERTIFICATE OF SERVICE

I verify by my signature below that a true and correct copy of the foregoing document has been forwarded on via U.S. Postal Service, first-class, pre-paid postage to each party listed below on this the 12th day of October, 2016.

/s/ Douglas J. Powell
DOUGLAS J. POWELL

Shrier, Karen Pamela
2536 Hackberry Rd.
Salado, TX

(and via electronic notice by the Court, to:)
Debbie Langehennig, Chapter 13 Trustee
U.S. Trustee

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